

western cabled systems

Cable Television

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PETITION FOR STAY
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JUN 22 1993

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June 10, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

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JUN 23 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Searcy:

This letter is to request a delay of the effective date of the Commission's Cable Television Rate Regulations. Western Cabled Systems is a small cable operator in the San Francisco Bay Area serving 8,000 subscribers in 9 franchises. Almost all of our customers reside either in multi-family developments (ie., condominiums and apartments) or rural situations (ie., home density down to 15 homes per mile). In both situations our operating costs are greater than conventional cable systems as a result of churn in the multi-family units and higher costs per subscriber for maintenance, electricity, and pole rental in the rural systems. Further, as you may be aware, the San Francisco Bay Area is one of the most expensive regions in which to live or operate a business.

We have analyzed the benchmark rates for each of our systems and simply put, with the benchmark rates we will barely be able to maintain current operations. We will be unable to obtain capital for technological advancements and most likely be in default with our loans.

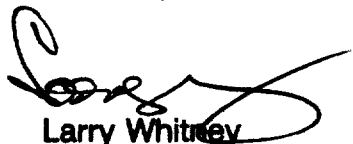
While we understand the Government's intention to rein in the "bad actors", companies like Western Cabled Systems today provide service to many residents who otherwise might still not have the advantages of cable television service. (of 8 franchises obtained since 1987, only 2 were under competitive situations).

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List A B C D E

Systems located throughout the San Francisco Bay Area

For the above reasons, we request that Cable Television Rate Regulations be stayed until a more workable environment for small operators can be established.

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry Whitney', with a large, sweeping flourish extending to the right.

Larry Whitney
President
Western Cabled Systems

cc: Congressman Edward J. Markey
Congressman Tom Lantos
Congresswoman Anna Eshoo
Senator Barbara Boxer
Senator Diane Feinstein
Senator Quentin Kopp
Assemblywoman Jackie Speier
Small Cable Business Association